

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

JEFFREY THOMAS SMITH,
SONIA OLIVIA SMITH
Debtors.

CHAPTER 13
CASE NO. 14-46405-MAR
JUDGE MARK A RANDON

**TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO
CONFIRMATION OF CHAPTER 13 PLAN**

NOW COMES the Chapter 13 Trustee, Krispen S. Carroll, and supplements her objections to confirmation of the Chapter 13 Plan in the above matter pursuant to E. D. Mich. LBR 3015-3(a) as follows:

1. Trustee objects to the change to Part II.C. of the Chapter 13 Plan. The Plan fails to provide that 100% of all tax refunds received by the debtors from the commencement of the case through the entire Plan pendency will be remitted to the Trustee for distribution among creditors in contravention of 11 U.S.C. § 1325(b)(1)(B) and In re Freeman, 86 F.3rd 478 (6th Cir. 1996).
2. Trustee questions the veracity of debtors' signatures on the page 8 of the Chapter 13 Plan filed September 17, 2014 where the date of the signature is August 13, 2014. Trustee notes it appears there is no date change from the last amended Plan.
3. Trustee questions the Worksheet which is calculated at 36 months even though the debtors propose a 60 month Plan in Part II.A. of the Chapter 13 Plan.
4. Trustee reiterates her original objection to confirmation #13.

WHEREFORE, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtors' Chapter 13 Plan.

OFFICE OF THE CHAPTER 13 TRUSTEE-DETROIT
Krispen S. Carroll, Chapter 13 Trustee

September 25, 2014

/s/ Maria Gotsis
KRISPEN S. CARROLL (P49817)
MARGARET CONTI SCHMIDT (P42945)
MARIA GOTSIS (P67107)
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**CERTIFICATE OF MAILING OF
TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO
CONFIRMATION OF CHAPTER 13 PLAN**

I hereby certify that on the date indicated below, I electronically filed **TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN** with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

GUDEMAN & ASSOCIATES
1026 W. ELEVEN MILE ROAD
ROYAL OAK, MI 48067-0000

and I hereby certify that I have mailed by United States Postal Service the above mentioned documents to the following non-ECF participants:

JEFFREY THOMAS SMITH
SONIA OLIVIA SMITH
29066 GRANDON STREET
LIVONIA, MI 48150-4080

September 25, 2014

/s/ Barbara A. Ecclestone
Barbara A. Ecclestone
For the Office of the Chapter 13 Trustee-Detroit
719 Griswold Street
Suite 1100
Detroit, MI 48226
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